# EXHIBIT C

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**Electronic Mail**

Adam Slater
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Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*
USDC, District of New Jersey, No. 1:19-md-2875-RBK-JS

Dear Mr. Slater:

I write on behalf of Mylan in response to Plaintiffs' letter dated August 17, 2020 concerning "apparent and potential deficiencies in Defendants' productions." Plaintiffs have incorrectly raised several alleged "deficiencies" with regard to Mylan related to (1) privilege logs, (2) production indexes, and (3) testing documents. This correspondence seeks to clarify each of these issues.

First, with respect to privilege logs, Mylan's most recent July 15, 2020 production of non-custodial ESI responsive to Plaintiffs' Rule 34 Requests did not contain any documents that were redacted or withheld on the basis of privilege. Indeed, Mylan has produced only a small number of privileged documents to date in this litigation, and has already provided a Privilege Log to Plaintiffs with respect to those documents. Mylan will provide privilege logs going forward, as needed, trailing each production. Further, with regard to a redaction log, Mylan requests the opportunity to meet-and-confer with Plaintiffs concerning both the content of such a log, and more generally, the need for a redaction log at this time given the nature of the information that Mylan has redacted from documents it has produced to date.

Second, Mylan flatly rejects Plaintiffs' assertion that "each defendant has produced a deficient Production Index with each of its productions." The production indexes that Mylan has provided to Plaintiffs comply with both the ESI Protocol, and with Plaintiffs' January 2020 request that information be included with the index that goes beyond that which the ESI Protocol requires. Plaintiffs specifically allege that the Defendants have failed to include required "source" information, stating that "the indexes often simply list "Custodial Production" or "Non-Custodial Production." Mylan, however, has identified specific categories of non-custodial documents by type and bates range. Further, we understand that Plaintiffs have made additional requests regarding the manner in which the "source" information should be defined. Mylan believes it has already provided the level of additional detail requested by Plaintiffs.

Finally, Plaintiffs incorrectly state that "Plaintiffs have only received a limited production of testing documents from ZHP and have received no non-custodial testing documents from the other Defendants." To the contrary Mylan has produced chromatography testing documents related to finished dose valsartan, which are contained in production volume 23 at MYLAN-MDL2875-00211465-MYLAN-MDL2875-00211489. Mylan will continue to produce testing documents on a rolling basis.

We trust that this clarifies each of the alleged "deficiencies" identified in Plaintiffs' August 21, 2020 letter. To the extent questions remain, please do not hesitate to contact me.

Very truly yours,

Clem C. Trischler

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